

From: <[spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org)>  
Date: Tue, Nov 28, 2017 at 4:35 PM  
Subject: Litigation hold: R.D.S. v. Jason Goodman, 3:17-CV-00601 MHL  
To: [privacyinquiries@gotinder.com](mailto:privacyinquiries@gotinder.com), [copyright@match.com](mailto:copyright@match.com), [help@gotinder.com](mailto:help@gotinder.com)  
Cc: [truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org), [georg.webb@gmail.com](mailto:georg.webb@gmail.com), [spoliation-notice@mailbox.org](mailto:spoliation-notice@mailbox.org),  
[contact@unrig.net](mailto:contact@unrig.net), [humantrafficking@ocfs.ny.gov](mailto:humantrafficking@ocfs.ny.gov), [uslawenforcement@google.com](mailto:uslawenforcement@google.com),  
[nyspmail@troopers.ny.gov](mailto:nyspmail@troopers.ny.gov)

TO: General Counsel, media service "TINDER"

Evidence Preservation and Anti-Spoliation Demand

Ladies and Gentlemen:

This litigation hold demand concerns the following TINDER user:

Jason Goodman  
252 7th Avenue, #6S  
New York, NY 10001

According to video materials posted on YouTube by "George Webb" and "Jason Goodman", contact was allegedly made by these two individuals with underage teenage girls on the platform TINDER.

In a separate video, the pair (Sweigert & Goodman) apparently discuss human trafficking in great detail. During the course of filming Webb brings up the TINDER accounts they both utilize and Goodman announced "CUT, CUT, CUT". This was taken to mean "stop filming".

Civil litigation has been brought against Mr. Goodman and includes allegations related to the foregoing information. See Robert David Steele (R.D.S.) in the subject line of this message.

This litigation demand requires that information contained in Mr. Goodman's account be preserved for litigation; whether or not contained in messages, membership applications, log files, audit trails, etc. Such evidence should include related account activity, two-ways message exchanges, images, etc.

As this matter may possibly border on issues of interest to law enforcement, appropriate agencies have been included in this evidence reservation demand.

Evidence Collection Team

**From:** "Spoliation Notice" <spoliation-notice@mailbox.org>  
**Date:** Sunday, October 14, 2018 1:41 AM  
**To:** <stevenbiss@earthlink.net>; "Spoliation Notice" <spoliation-notice@mailbox.org>  
**Cc:** <jason@21stcentury3d.com>; <jasongoodman72@protonmail.com>; <truth@crowdsourcethetruth.org>  
**Attach:** case2.jpg  
**Subject:** N.Y. CPLR 3113 NOTICE FOR ROBERT DAVID STEELE

To:  
Steven Scott Biss  
300 West Main St  
Ste 102  
Charlottesville, VA 22903  
804-501-8272  
Fax: 202-318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

Dear Sir,

You have been identified as the legal counsel for Robert David Steele. Your client will be called as a witness in a federal lawsuit (see attached). N.Y. CPLR 3113 requires a notice to potential witnesses to prepare for deposition and other discovery.

This is your evidence preservation demand for all electronic evidence in the possession of your client for the previous two (2) years -- October 1, 2016 to the present. Please instruct your client that he is under a duty to safely archive and preserve all media and electronic evidence on all electronic devices in his possession.

This includes all e-mail messages exchanged with Jason Goodman, George Webb Sweigert, Manual Chavez, III, etc. This includes text messages, phone records, e-mail messages, etc. This includes cell phones, personal device, laptop computers, etc.

Your client has a duty to safely preserve and archive such evidence and to prevent spoliation of same. No alteration or destruction of said evidence is permitted.

Warm regards,

Evidence Collection Team